Surface Inspection and Enforcement for Fluid Minerals

FIELD EXERCISE – Inspection and Enforcement Project Presentation

Instructions:

- I. This is an individual exercise.
- II. After the webinar for M1L6, "Documenting Compliance Inspections," conduct an official environmental/surface production inspection (ES-SP) at a well site in your field office. The inspection and well site must meet the following criteria:
 - 1. Inspector must conduct a full inspection without aid from other BLM inspectors.
 - 2. Conduct the inspection as if it is a normal inspection that you would conduct outside of this training course, but use the knowledge and skills you have learned from the course to complete the inspection. **Note**: Inspect the access road or offsite facilities if they are associated with the well site.
 - 3. Well site must contain a secondary containment structure around production tanks so that the inspector can calculate the effective holding capacity.
 - 4. The inspection must occur on a well site within BLM's jurisdiction and in the AFMSS database.
 - 5. The inspection must include a problem or violation. **Note**: Do not create an imaginary problem or violation; therefore, you may need to conduct an ES-SP inspection at several different well sites until you find a well site with a problem or violation.
- III. Each student will need to accomplish all of the following tasks for this exercise:
 - 1. Conduct action research for the inspection.
 - 2. Inspect the well site and complete the official environmental inspection form.
 - 3. Take photographs during the inspection.
 - 4. Enter the inspection into AFMSS (training or production database).
 - a. Take screenshots of the inspection activity details in AFMSS (i.e., screen with hours, open/close dates, remarks, etc.).
 - b. Take screenshots of the inspection remarks.
 - 5. After the webinar for M2L1, "Conducting Initial Enforcement Actions," enter the enforcement action into AFMSS (training or production database).
 - a. Take screenshots of the enforcement action details (i.e., screen with type of enforcement, abatement date, etc.)
 - 6. Compile inspection and enforcement documentation.
 - 7. To simulate the task of filing the documentation, scan and download all documents and information you would file in the well file for a normal inspection, including but not limited to:
 - a. Inspection form
 - b. Photographs with descriptive information according to policy
 - c. Document with secondary containment calculations
 - d. Enforcement action form (completed)
 - e. Certified Mail receipt (if enforcement action was mailed)

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- IV. Prior to the start of the webinar meeting for M2L2 "Conducting Additional Enforcement Actions," each student must email the NTC Course Administrator the following documents in a JPEG, PDF, or Microsoft Word format:
 - 1. Inspection form (completed for inspection)
 - 2. Photographs with descriptive information
 - 3. Document with secondary containment calculations
 - 4. Enforcement action form (completed)
 - 5. Certified Mail receipt (if enforcement action was mailed)
 - 6. AFMSS screenshot(s) of inspection activity details
 - 7. AFMSS screenshot(s) of inspection remarks
 - 8. AFMSS screenshot(s) of enforcement action details
- V. At the Project Presentation webinars (see syllabus), each student will have <u>15 minutes</u> to present their inspection and enforcement documentation to the instructors and classmates.
 - 1. The NTC Course Administrator will present (screen-share) the actual documents, but the student will present the information on the documents.
 - 2. The instructors will guide the student through the presentation with questions.
- VI. At the end of each student presentation, the following sequence of events will occur:
 - 1. Critique by Student Presenter (2-minute duration):
 - a. The student who presented the I&E documentation will provide their own opinion on how they did for the inspection and if they could improve anything.
 - 2. Feedback from <u>Classmates (5-minute duration)</u>:
 - a. Classmates will provide feedback and/or ask questions regarding the inspection presented.
 - b. Feedback will include positive re-enforcements (i.e., what you liked) and/or suggestions for improvement.
 - 3. Feedback from Instructors/NTC Administrator (8-minute duration):
 - a. Instructor(s) will provide constructive feedback for the student presenter.
- VII. Other Exercise Information
 - 1. This will not be a graded exercise.
 - 2. Presentation and feedback will last no longer than **30 minutes**.
 - 3. It is the student's choice to enter the inspection and enforcement action into the training or production environment within AFMSS.
 - 4. Mailing or hand-delivering enforcement actions to an operator or individual is not a requirement for this exercise. This action is left to the discretion of the student and their supervisor.
 - 5. Non-BLM students that do not have access to AFMSS do not have to complete the AFMSS-related tasks outlined in Sections III and IV of this document.